

CHRISTOPHER CHIOU  
Acting United States Attorney  
District of Nevada  
Nevada Bar Number 14853  
**ALLISON REESE**  
Nevada Bar Number 13977  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Email: [allison.reese@usdoj.gov](mailto:allison.reese@usdoj.gov)  
*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No.: 2:21-mj-00547-BNW

Plaintiff,

**STIPULATION TO CONTINUE THE  
PRELIMINARY EXAMINATION  
HEARING  
(First Request)**

MIGUEL ANGEL MANDUJANO-SANCHEZ,

**Defendant.**

IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER CHIOU, United States Attorney, and ALLISON REESE, Assistant United States Attorney, counsel for the United States of America, and RENE L. VALLADARES, Federal Public Defender, and ANDREW WONG, Assistant Federal Public Defender, counsel for Defendant MIGUEL ANGEL MANDUJANO-SANCHEZ, that the preliminary examination hearing in the above-captioned matter, currently scheduled for July 8, 2021, at 2:30 p.m., be vacated and continued for thirty (30) days, to a date and time to be set by this Honorable Court.

111

111

This stipulation is entered into for the following reasons:

1. The Government needs additional time to produce relevant discovery to Defense Counsel.

2. Defense Counsel needs additional time to review the discovery, conduct additional investigation, and confer with the Defendant about how he would like to proceed.

3. The parties agree to the continuance.

4. Defendant MIGUEL ANGEL MANDUJANO-SANCHEZ is not in custody and does not object to the continuance

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested herein is not sought for purposes of delay, but to allow for a potential pre-indictment resolution of the case.

7. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1(d).

8 This is the first request for a continuation of the preliminary examination hearing.

DATED: July 8, 2021

Respectfully submitted

**CHRISTOPHER CHIOU**  
Acting United States Attorney

/s/ Allison Reese

---

**ALLISON REESE**  
Assistant United States Attorney

/s/ Andrew Wong

---

**ANDREW WONG**  
Counsel for Defendant Miguel Angel Mandujano-Sanchez

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No.: 2:21-mj-00547-BNW

Plaintiff,

## ORDER

vs.

MIGUEL ANGEL MANDUJANO-SANCHEZ,

**Defendant.**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Government needs additional time to produce relevant discovery to Defense Counsel

2. Defense Counsel needs additional time to review the discovery, conduct additional investigation, and confer with the Defendant about how he would like to proceed

3. Defendant MIGUEL ANGEL MANDUJANO-SANCHEZ is not in custody and does not object to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested herein is not sought for purposes of delay, but to allow for a potential pre-indictment resolution of the case.

6. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1(d).

<sup>7</sup> This is the first request for a continuation of the preliminary hearing.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the preliminary hearing date.

## **CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein to potentially resolve the case prior to indictment, and further would deny the parties sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for the preliminary hearing, taking into account the exercise of due diligence.

The continuance sought herein is allowed, with the defendant's consent, pursuant to Federal Rules of Procedure 5.1(d).

## ORDER

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for July 8, 2021, at 2:30 p.m., be vacated and continued to August 12, 2021, at the hour of 2:00 p.m.

DATED this 8th day of July, 2021.

  
THE HONORABLE BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE